

(800) Operating Companies
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	300649
<015>	Study Area Name	ORWELL TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Barbara Galardo
<035>	Contact Telephone Number - Number of person identified in data line <030>	2075354126 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	bgalardo@fairpoint.com
<810>	Reporting Carrier	Orwell Telephone Company
<811>	Holding Company	FairPoint Communications, Inc.
<812>	Operating Company	Orwell Telephone Company

<813>	<a1>	<a2>	<a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	Elltel Long Distance Corp.		dba FairPoint Long Distance
	Enhanced Communications of Northern New England Inc.		
	ExOp of Missouri Inc.		
	FairPoint Broadband, Inc.		
	FairPoint Business Services LLC		
	FairPoint Carrier Services, Inc.		
	FairPoint Communications Missouri, Inc.	421472	dba FairPoint Communications Inc.
	FairPoint Logistics, Inc. (f/k/a MJD Capital Corp.)		
	FairPoint Vermont, Inc. (TG)	143331	dba FairPoint Communications Inc.
	Germantown Independent Telephone Company	300618	dba FairPoint Communications Inc.
	Germantown Long Distance Company		dba FairPoint Long Distance
	GTC, Inc.	210291	(Floral) dba FairPoint Communications Inc.
	GTC, Inc.	210329	(Perry) dba FairPoint Communications Inc.
	Maine Telephone Company, INC	100025	dba FairPoint Communications Inc.
	Marianna Scenery Hill Telephone Company	170185	dba FairPoint Communications Inc.
	Marianna Tel., Inc.		
	MJD Services Corp.		
	MJD Ventures, Inc.		
	Northern New England Telephone Operations LLC (NNE)	125113	dba FairPoint Communications Inc.
	Northern New England Telephone Operations LLC (NNE)	105111	dba FairPoint Communications Inc.
	Northland Telephone Company of Maine, Inc.	103313	dba FairPoint Communications Inc.
	Odin Telephone Exchange, Inc	341065	dba FairPoint Communications Inc.
	Orwell Communications, Inc.		dba FairPoint Long Distance

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<a1>	<a2>	<a3>
Affiliates	SAC	Doing Business As Company or Brand Designation
Orwell Telephone Company	300649	dba FairPoint Communications Inc.
Peoples Mutual Long Distance		
Peoples Mutual Telephone Co	190244	dba FairPoint Communications Inc.
Quality One Technologies, Inc.		dba FairPoint Long Distance
Ravenswood Communications, Inc.		
Sidney Telephone Company	103313	dba FairPoint Communications Inc.
ST Enterprises, Ltd.		
ST Long Distance, Inc.		dba FairPoint Long Distance (Kansas, Colorado, Oklahoma)
St. Joe Communications, Inc.	210339	dba FairPoint Communications Inc.
Standish Telephone Company, INC	100025	dba FairPoint Communications Inc.
Sunflower Telephone Co	461835	dba FairPoint Communications Inc.
Taconic Technology Corp.		
Taconic TelCom Corp.		dba FairPoint Long Distance
Taconic Telephone Corp.	150084	dba FairPoint Communications Inc.
Telephone Operating Company of Vermont LLC (NNE)	145115	dba FairPoint Communications Inc.
UI Long Distance, Inc.		dba FairPoint Long Distance
Utilities, Inc.		dba FairPoint Communications Inc.
YCOM Networks, Inc.	522453	dba FairPoint Communications Inc.

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Line 112- Service Quality Improvement Reporting
{47 CFR 54.313(a)(1)}

1. In the FCC's Public Notice DA 14-951, released May 1, 2014, the FCC waived the requirement for price cap ETCs to file a five-year plan. The bureau stated that "until the [Connect America Phase II forward-looking] cost model is adopted and incumbents have the opportunity to accept a state-level commitment, it does not serve the public interest" to require price cap ETCs to file five-year plans.¹

¹ *Connect America Fund et al.* WC Docket No. 10-90 et al., Order, 28 FCC Rcd 2051, 2054, para. 8 (Wireline Comp. Bur. 2013) (*ETC Reporting Requirements Order*).

The Orwell Telephone Company
300649

For the period January 1, 2014 through December 31, 2014, The Orwell Telephone Company , (SAC
#300649) had [REDACTED]

The Orwell Telephone Company
300649

For the period January 1, 2014 through December 31, 2014, The Orwell Telephone Company , (SAC #300649) had [REDACTED]

Orwell Telephone Company

Ohio

300649

Line 510: Service Quality Reporting/Consumer Protection Rules Compliance

Orwell Telephone Company d/b/a FairPoint Communications, hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company complies with service quality and consumer protection provisions under state law and rule. These provisions include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of The Public Utilities Commission of Ohio which discloses rates, terms and conditions of service to customers; (2) compliance with state consumer protection provisions relating to Customer Services as identified in Chapter 4901 of the Telephone Company Procedures and Standards, compliance with provisions for Quality of Service as identified in Chapter 4901 of the Telephone Company Procedures and Standards, , compliance with customer Inquiry procedure as identified in Chapter 4901 of the Telephone Company Procedures and Standards, compliance with Dispute standards as identified in Chapter 4901 of the Telephone Company Procedures and Standards; (3) compliance with truth-in-billing requirements; and (4) compliance with Federal CPNI rules, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make "a specific commitment to objective measures to protect consumers." ² The Commission found that for wireless ETCs, compliance with CTIA's Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis. In this context, the FCC stated, "to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement."³

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) ("2005 ETC Order").

² *Id.* at para. 2

Orwell Telephone Company, is not currently subject to service quality reporting. The Public Utilities Commission of Ohio Rules Chapter 4901:1-6 "Telephone Company Procedures and Standards" section 4901:1-6-12 "Service Requirements for BLES" states "A local exchange carrier (LEC) providing basic local exchange service (BLES) shall conduct its operations so as to ensure that the service is available, adequate, and reliable consistent with applicable industry standards." FairPoint Communications currently is not required to report any service quality results unless requested by the Public Utilities Commission of Ohio. For the service quality standards FairPoint Communications does track (a) Installation within 5 business days; (b) Out of Service Repair within 24 hours; Its results are available, adequate, and reliable consistent with applicable industry standards.

If a customer has a concern about their FairPoint Communications' service or billing, he/she can contact repair service, technical support or customer service with information found on their billing statement. Customers may also contact agencies, through information posted in the phone directory, website, and tariff pages. All consumer complaints whether from Attorney Generals' offices, Public Utility Commissions, Better Business Bureaus, Federal Communications Commission and all other agencies are sent to the FairPoint Communications' Maine office via U.S. Mail or by electronic mail at consumer@fairpoint.com. The complaints are directed to the appropriate responsible Company Team member within FairPoint Communications for resolution and response to the customer.



FairPoint Communications
1 Davis Farm Road
Portland, ME 04103

Business Continuity Plan Overview

Introduction

FairPoint Communications, Inc. ("FairPoint") is committed to maintaining a vigilant state of disaster preparedness for the interests of our customers, stockholders, employees and other critical stakeholders.

The purpose of our Business Continuity Plan ("BCP") is to define the disaster preparedness and recovery protocols and procedures required to restore FairPoint's critical business support functions, inside and outside plant systems and operations within FairPoint's operating footprint.

BCP components detail FairPoint's procedures for preparing for and responding to an emergency situation affecting our ability to deliver core services to our customers and our ability to meet legal dictates, and regulatory requirements.

This document discusses the following:

- BCP Scope
- BCP Components
- Plan Maintenance

BCP Scope

FairPoint's business continuity response planning is concentrated on two critical operational areas:

- Customer Interfacing – It is recognized that a "business impact" only occurs when an external-interfacing element is disrupted. In essence, this means that if FairPoint experiences a disruptive event, but one that does not breach the outer-shell of the FairPoint operation and interrupt critical customer services, customer product or other external end-user, then it does not have a business impact, as defined by the BCP
- Infrastructure Integrity – Without critical infrastructure systems, the ability for all other FairPoint business operations (back / front office) can come to a halt. It is these infrastructure systems that provide the critical human-factor of our customer-interfacing services. Critical infrastructure would address such services / systems as, building space for staff and equipment, service utilities, telecommunications and data network, IT network, and related infrastructure based items.

The BCP has been developed to assure the continuity of critical customer interfacing services and systems should a physical incident or workforce disruption event occur, which affects:

- Information Technology ("IT")
- Administrative and Support Operations
- Inside and Outside Plant Operations
- Network Operations Center ("NOC")
- Enhanced 9-1-1 ("E-911")
- Dispatch
- Repair Center

FairPoint has developed response / recovery strategies addressing physically disruptive incidents and workforce related disruptive incidents. All response strategies are based on recovery time objectives of those department functions and critical infrastructure systems essential to sustain customer interfacing services.



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BCP Components

The BCP consists of several components:

- Operational Preparedness for Expected Events (i.e. weather related events)
- Event / Crisis Communication Plan
- Redundancy Mapping
- Department Recovery Plans
- Information Technology Continuity Plan

The following is a brief summary of the plan components.

Operational Preparedness for Expected Events

Weather events such as snow, ice and wind can negatively impact power and communications infrastructure. While this threat cannot be eliminated, FairPoint takes steps to mitigate a storm's impact through preparedness and response. Steps include:

- Pre-event planning based on information provided by National Oceanic and Atmospheric Administration ("NOAA")
- Coordinate planning and recovery efforts through state emergency management groups
- Engage supply chain vendors to deliver additional stock prior to the expected event
- Inspect, test and fuel emergency generators in anticipation of a power outage
- Reallocate / relocate staff in order to respond to the pending event

Event / Crisis Communication Plan

Communications is a key element to respond and recover business operations. Event / Crisis Communications are facilitated by FairPoint's Risk Management Team who assume the role of incident command from the onset of the event until normal operations are resumed.

FairPoint uses a dual level communication strategy as part of the Event Communication Plan. The primary level is the workgroup comprised of both employees and vendors that are directly involved in the recovery work. The secondary level consists of internal interested parties made up of our Strategic Leadership Team. The role of the secondary level is to facilitate communications both internally and externally regarding the event and our path to response and recovery. For 2014, FairPoint has partnered with SunGard and will be deploying a hosted event communication platform in order to increase our speed and reach of communications during an event.

Redundancy Mapping

The process of redundancy mapping reviews operations within the FairPoint organization to identify alternate facilities and work locations that can be used in the event a primary location is not accessible. Given the geographic spread of FairPoint's Northern New England footprint, capabilities exist to relocate operations from event impacted areas. Through the mapping process, FairPoint is able to identify single points of failure and develop alternative work processes.

Department Recovery Plans

Each department has developed a recovery plan based on its critical operations as they pertain to the deliverables they contribute to our customers. FairPoint has triaged the recovery efforts based on the concept of customer servicing impact. Federal and State regulatory requirements, along with E-911 needs, have a high level of consideration in addition to the business impact concerns. The BCP goal is to minimize the disruption duration as much as is practical and provide a level of risk mitigation that will maintain critical operations. The recovery plans are built around a 24-hour to 72-hour response plan. This methodology



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Portland, ME 04103

focuses on the immediate steps that need to be taken to recover functional operations within short duration events (less than 24 hours) and well as long term plans to maintain functionality during an extended event (up to, or greater than 72 hours).

IT Recovery Plan

Like most operations, FairPoint is dependent on an IT infrastructure to conduct business and serve customers. Because of its importance, FairPoint has a continuity plan established specifically for IT operations. The IT continuity plan addresses security and access control of data sites, onsite / offsite data backup methods, processes for sequencing of system(s) recoveries and ultimately the use and execution of our established Disaster Recovery Site located outside the FairPoint footprint.

Plan Maintenance and Exercising

The BCP is a so called "living" document. Updates to the plan are ongoing with changes incorporated annually at a minimum. Individual plan components are reviewed with oversight from FairPoint's Risk Management Team. In 2013, FairPoint began the process of migrating the BCP onto a cloud based solution which will allow access to the plan components from any computer, smartphone and tablet.

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Line 1010 – Voice Service Rate Comparability

The pricing of the company's voice service rate is no more than two standard deviations above the applicable national average urban rate for voice service, as specified in the most recent public notice, FCC DA15-470 released on April 16, 2015.

For Rates See Attachment: (700) Company Price Offerings (voice)

Form 481 Line 1210- Terms & Conditions for Lifeline Customers

Orwell Telephone Company provides a Lifeline Program discount for residence service for eligible low income customers. The Lifeline Program discount is applied to any month to month residence local service, package or bundle offering. The discount is intended to offset the Subscriber Line Charge and local line charge, although eligible packages and bundles may have toll calling included in the pricing for the offering.

The tariff page outlining the terms of the Lifeline Program in Orwell Telephone Company is attached. The terms and conditions of residential basic local exchange service, package and bundle offerings can be found at <http://www.tariffs.net/fairpoint/tier.asp?cid=1644>.

Form 481 Line 1210- Terms & Conditions for Lifeline Customers

Orwell Telephone Company
d/b/a FairPoint Communications

SECTION NO. 4
First Revised Sheet No. 1
Replaces Original Sheet No. 1

P.U.C.O. NO. 8

LIFELINE REQUIREMENTS

(T)

The Company shall provide Lifeline service as defined in 47 C.F.R. § 54.401(a) on a non-discriminatory basis to all qualifying low-income customers. The Company's Lifeline service offering shall comply with all applicable federal and state laws, including, but not limited to, 47 C.F.R. Part 54, Subpart E; the FCC's Lifeline reform order (Report and Order released February 6, 2012, WC Docket No. 11-42, et.al) and any subsequent clarifying orders; Section 4927.13, Revised Code; Rule 4901:1-6-19, Ohio Administrative Code; and the Commission's nontraditional Lifeline service order (Finding and Order adopted May 23, 2012, Case No. 10-2377-TP-COI) and any subsequent entries and/or orders

(N)

Issued: June 11, 2012

Effective: June 11, 2012

In Accordance with Case No. 90-5033-TP-TRF
Issued by the Public Utilities Commission of Ohio
Patrick I. Morse, Senior Vice President